UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Amphenol Corporation and Outdoor) Civil Action No. 19-cv-15962-JXN-
Wireless Networks, LLC,) LDW
Plaintiffs,)))
V.)
Rosenberger Technology (Kunshan))
Co. Ltd.,` Rosenberger Asia Pacific) CONSOLIDATED INDEX IN
Electronic Co., Ltd., Rosenberger) SUPPORT OF THE MOTION TO
Technology LLC, Rosenberger USA) SEAL PLAINTIFFS' JUNE 4,
Corp., Rosenberger North America) 2025 LETTER TO THE COURT
Pennsauken, Inc., Rosenberger Site) (DKT. 632)
Solutions, LLC, Rosenberger)
Hochfrequenztechnik GmbH & Co.)
KG, Northwest Instrument, Inc., and)
CellMax Technologies AB)
)
Defendants.)

I. Plaintiffs' June 4, 2025 Letter to the Court (Dkt. 632)

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Plaintiffs'	These portions of	Possible injury	Redacted	Plaintiffs do not object.
Letter Seeking	Plaintiffs' June 4,	and prejudice to	version of	-
leave to File	2025 Letter include	Defendants'	Plaintiffs'	
Sanctions	information that has	competitive	June 4, 2025	
Motion (Dkt.	been marked as	standing in the	Letter that	
632 at 1)	Attorneys' Eyes Only	base station	may be filed	
	and/or Confidential	antenna	publicly.	
	under the Discovery	marketplace.		
	Confidentiality Order	Disclosure of this		
	(Dkt. 22), including	information would		
	Interrogatory	also cause clearly		
	Requests, Requests for	defined and		
	Production, responses	serious injury to		
	to Requests for	Defendants		
	Production and	because it would		
	Interrogatories,	reveal discovery		
	deposition transcripts,	information that		
	and confidential and	has been		
	non-public	designated		
	information about	Attorneys' Eyes		
	Defendants' business.	Only and/or Confidential under		
	(Yu Decl., ¶ 3).	the Discovery		
		Confidentiality		
		Communitianty		

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	In addition, portions of Plaintiffs' June 4, 2025 Letter were previously sealed pursuant to the Court's Sealing Order, Dkt. 293, granting Joint Motion to Seal Motion for Sanctions Pursuant to L. Civ. R. 5.3, Dkt. 283; see also Dkt. 283-5.	Order (Dkt. 22). (Yu Decl., ¶ 3).		
Plaintiffs' Letter Seeking leave to File Sanctions Motion (Dkt. 632 at 2	These portions of Plaintiffs' June 4, 2025 Letter include information that has been marked as Attorneys' Eyes Only and/or Confidential under the Discovery Confidentiality Order (Dkt. 22), including the June 20, 2024 deposition of Shang	Possible injury and prejudice to Defendants' competitive standing in the base station antenna marketplace. Disclosure of this information would also cause clearly defined and	Redacted version of Plaintiffs' June 4, 2025 Letter that may be filed publicly.	Plaintiffs do not object.

Document	Basis for Sealing	Clearly Defined	Why a Less	Party in Opposition to Sealing, if any, and
		and Serious	Restrictive Alternative to	Basis
		Injury that Would Result if	the Relief	
		the Relief is Not		
		Granted	Sought is Not Available	
	II		Available	
	Hong, expert reports,	serious injury to		
	Interrogatory	Defendants		
	Requests, Requests for	because it would		
	Production, responses	reveal discovery		
	to Requests for	information that		
	Production and	has been		
	Interrogatories, and	designated		
	confidential and non-	Attorneys' Eyes		
	public information	Only and/or		
	about Defendants'	Confidential under		
	business. (Yu Decl.,	the Discovery		
	¶ 3).	Confidentiality		
		Order (Dkt. 22).		
	In addition, portions	(Yu Decl., ¶ 3).		
	of Plaintiffs' June 4,			
	2025 Letter were			
	previously sealed			
	pursuant to (i) the			
	Court's Sealing Order,			
	Dkt. 584, granting			
	Joint Motion to Seal			
	Joint Submission			
	Regarding Plaintiffs'			
	Discovery Issue, Dkt.			

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Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	579, and (ii) the Court's Sealing Order, Dkt. 585, granting Joint Motion to Seal January 25, 2024 Hearing Tr., Dkt. 576; see also Dkt. 576-4; 579-4; 586; 588.			